

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Warren Steel Holdings - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region V

**Subject:** POLREP #6  
Progress  
Warren Steel Holdings  
C5AV  
Warren, OH  
Latitude: 41.2629796 Longitude: -80.7990185

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**From:** Stephen Wolfe, OSC

**Date:** 5/21/2018

**Reporting Period:** 05/14/2018 through 05/19/2018

1. Introduction

1.1 Background

<b>Site Number:</b>	C5AV	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	2/20/2018
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	4/24/2018	<b>Start Date:</b>	4/24/2018
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	OH0011207	<b>RCRIS ID:</b>	OHD066060608
<b>ERNS No.:</b>		<b>State Notification:</b>	yes
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

1.1.1 Incident Category

Time Critical Removal Action

NOTE: POLREPS 1 and 2 were for emergency response actions (initial and final) that occurred 04/27/17 through 6/02/2017

1.1.2 Site Description

WSH is a former 400-acre steel manufacturing facility. The site was in operation from at least the 1940s, and all operations official ceased at the facility in January 2016. EPA is gathering all drums and containers of hazardous waste that was abandoned at the facility as well as inspecting approximately 100 transformers for possible pcb oil/threat to waterway.

1.1.2.1 Location

4000 Mahoning Street, Warren, Ohio.

1.1.2.2 Description of Threat

EPA and Ohio EPA documented abandoned drums/totes/other containers containing hazardous waste (corrosives, pcb oil, used oil) at the site. EPA performed a site assessment on April 27, 2017 and documented that some of the material had a pH of 1-2 standard units and 14 standard units. A sample of oil from a pit on the site tested positive for pcbs at 90 ppm. Labeling is present on the majority of the containers indicating sulfuric acid, caustics, and water treatment chemicals.

Approximately 100 transformers are present on site, half of which are located near the bank of the Mahoning River. No data is available on whether or not the transformers contain oil/pcb oil. EPA will

investigate the transformers as part of the Removal Action and handle appropriately.

**1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

Information from Ohio EPA and the EPA site assessment indicated the presence of caustic material (acid and bases) as well as used, oil, and pcb contaminated oil. The EPA site assessment noted the presence of possible asbestos containing materials; however, asbestos removal is not a part of this removal action. EPA will address any loose asbestos if the material inhibits the ability to gather the containers of hazardous waste.

**2. Current Activities**

**2.1 Operations Section**

**2.1.1 Narrative**

This is a Time Critical Removal Action focusing on the removal of drums and other containers of hazardous waste. Electrical Transformers will also be inspected to determine if they are full of oil/pcb oil.

**2.1.2 Response Actions to Date**

On Monday, May 14, 2018 ERRS continued to collect drums and other containers from the site. ERRS collected oil samples (pcb analysis) from several tanks/pits containing waste oil. Drums and other containers were staged in the staging area for hazardous categorization. An ERRS subcontractor (welder) was on site to cut open bay doors to two buildings for access to drums and totes of hazardous materials.

On Tuesday, May 15, 2018, ERRS continued to collect drums and other containers from the site. ERRS removed totes/drums from the wastewater treatment plant (across River Road) and staged the material for disposal. ERRS continued sampling containers for hazardous categorization analysis and bulking like smaller containers.

On Wednesday May 16, 2018, ERRS continued to collect drums and other containers from the site. ERRS removed totes/drums from the wastewater treatment plant (across River Road) and staged the material for disposal. ERRS continued sampling containers for hazardous categorization analysis and bulking like smaller containers. A local company that ships material for the steel industry was on site inspecting the materials in super sacks to see if it can be re-used versus disposed of in a landfill. The company will evaluate options and let EPA know before July 9th, 2018 (expected disposal time).

On Thursday May 17, 2018, ERRS continued to collect drums and other containers from the site. ERRS continued sampling containers for hazardous categorization analysis and bulking like smaller containers. EPA, START and ERRS RM conducted final walkthroughs of site buildings to ensure all waste materials had been collected and staged.

On Friday, May 18, 2018, ERRS collected samples for disposal analysis and secured the site for temporary demobilization.

ERRS temporarily demobilized from site on Saturday, May 19, 2018 to await disposal analysis and waste acceptance.

To date an estimated 150 drums and 50 totes full of material have been gathered for disposal. Numerous other smaller containers are being bulked into larger containers for disposal. Approximately 40 cylinders (oxygen, acetylene, hydrogen, propane) have been gathered and there are approximately 200 fire extinguishers located on site that will be gathered for disposal. There are approximately 4 cubic yard boxes worth of paint related material (oil based/latex, and aerosols). Other miscellaneous items for disposal includes 4,000 pounds of Calcium Carbide (water reactive), 7 cubic yards of Hilti Gun cartridges, and approximately 100 super sacks of lime. Approximately 100 empty containers have also been gathered and will be cut apart for disposal. There are an estimated 120 transformers on site that require sampling (pcb analysis).

Daily air monitoring (particulate) is being performed by START in dusty areas. Acid gas monitoring and general air monitoring (MultiRAE) is being performed during drum/container sampling.

**2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

Ongoing.

**2.1.4 Progress Metrics**

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

**2.2 Planning Section**

**2.2.1 Anticipated Activities**

profile containerized waste  
Investigate transformers, pcb analysis (~120)  
Investigate options for containerized K061 wastes  
T&D of containerized waste  
Drain pcb contaminated transformers and transformers located on the bank of the Mahoning River.

**2.2.1.1 Planned Response Activities**

Transformer sampling is scheduled for the week of June 11th 2018  
anticipated date to begin disposal is July 9th

### 2.2.1.2 Next Steps

Obtain disposal analytical results/profile waste/send out for bid and schedule disposal (anticipated beginning July 9)  
sample transformers (scheduled week of June 11)

### 2.2.2 Issues

no work concerning transformers can be scheduled until they are sampled for pcb analysis.

## 2.3 Logistics Section

ERRS provided all logistics for the site

## 2.4 Finance Section

### 2.4.1 Narrative

EPA Branch Chief verbally authorized a \$50,000 ceiling for the Emergency Response phase.

An Action Memo was signed on February 2, 2018 for the time critical removal action with a ceiling limit of \$1,878,830 for removal actions. A delivery issue was issued to ERRS for \$300,000 to begin response actions.

### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$300,000.00	\$165,000.00	\$135,000.00	45.00%
TAT/START	\$33,850.00	\$15,500.00	\$18,350.00	54.21%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$333,850.00</b>	<b>\$180,500.00</b>	<b>\$153,350.00</b>	<b>45.93%</b>

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

## 2.5 Other Command Staff

### 2.5.1 Safety Officer

Safety briefings are held before the start of every workday and at the end of the work day.

### 2.5.2 Liaison Officer

OSC Steve Wolfe

### 2.5.3 Information Officer

OSC Steve Wolfe

## 3. Participating Entities

### 3.1 Unified Command

OSC Steve Wolfe

### 3.2 Cooperating Agencies

OSC Steve Wolfe

## 4. Personnel On Site

1 EPA  
1 START  
7 ERRS

## 5. Definition of Terms

No information available at this time.

## 6. Additional sources of information

### 6.1 Internet location of additional information/report

[response.epa.gov/WSH](http://response.epa.gov/WSH)

### 6.2 Reporting Schedule

## 7. Situational Reference Materials

NCP and CERCLA.